

ITEM:

SUBJECT: City of Dixon Wastewater Treatment Facility, Solano County

BOARD ACTION: *Consideration of a Cease and Desist Order*

BACKGROUND: The City of Dixon owns and operates a wastewater treatment facility that treats domestic and commercial wastewater in Dixon, Solano County. The WWTF is regulated by Waste Discharge Requirements (WDRs) Order No. 94-187 and Cease and Desist (C&D) Order No. 97-193. The Discharger has violated the WDRs and C&D Order by causing groundwater pollution and by failing to construct facility improvements to minimize and control the groundwater pollution.

In 1997, the Regional Board adopted C&D Order No. 97-193, which required that the Discharger evaluate groundwater degradation; eliminate the migration of pollutants to groundwater as appropriate; evaluate current and projected future dry weather influent flows; and expand the WWTF to accommodate projected growth.

The City of Dixon has made some effort to comply with the 1997 C&D Order, but has not achieved full compliance. Groundwater pollution was confirmed in 1998 and continues unabated to date. Dissolved solids, sodium, and chloride concentrations downgradient of the facility exceed applicable water quality limits. For example, total dissolved solids concentrations downgradient of the facility during the first quarter of 2005 ranged from 740 to 1,200 mg/l, exceeding the average 690 mg/l in background wells and the 450 mg/l water quality objective.

The Discharger has complied with the intent of C&D Order No. 97-193 with respect to capacity improvements for existing flows and controlling excess inflow/infiltration (I/I). However, the existing WWTF does not have sufficient treatment and disposal capacity to accommodate more than three years of projected growth. The Discharger submitted a Report of Waste Discharge that proposes reliance on increased evaporation and percolation to dispose of these increased flows. Staff rejected the RWD because the proposal will likely exacerbate groundwater pollution at the facility.

The proposed C&D Order requires that the Discharger bring the facility into compliance with the Groundwater Limitations of the WDRs by 2008 and ensure adequate capacity for planned future development. The proposed Order contains (a) new flow and effluent quality limitations and (b) several milestone tasks to ensure that the Discharger is progressing towards compliance with the new effluent limitations, as well as completing previously planned improvements projects to control I/I.

ISSUES:

The Discharger requested additional time to allow the Dixon City Council to personally consider the proposed C&D Order and direct City staff's comments. Staff carefully considered this request and concluded that it was appropriate to proceed with the planned 23/24 June hearing date. It is noted that this proposed Order will be discussed at the Dixon City Council meeting in mid-June, and that Regional Board and City staff will meet shortly thereafter to discuss the City's concerns. Staff may propose late revisions as a result of this meeting.

Staff recommends that the Board adopt the Cease and Desist Order with possible late revisions.

Mgmt. Review \_\_\_\_\_  
Legal Review \_\_\_\_\_

23/24 June 2005 Board Meeting

23 June 2005  
Coastal Hearing Room – 2<sup>nd</sup> Flr  
Joe Serna Jr./Cal/EPA Building  
1001 I Street  
Sacramento, CA 95814

24 June 2005  
Central Valley RWQCB  
11020 Sun Center Drive, St. 200  
Rancho Cordova, CA 95670-6114